

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action: 6:23cv00054
	)	
THE CITY OF LYNCHBURG, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**MOTION TO DISMISS**

Defendants City of Lynchburg, Virginia (the “City”) and Officer Seth Reed, by counsel, move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure to dismiss the Complaint and in support thereof state that the Complaint fails to state a claim upon which relief can be granted as more fully set forth in Defendants’ Memorandum in Support of Motion to Dismiss.

**WHEREFORE**, Defendants respectfully move the Court to dismiss the Complaint with prejudice.

CITY OF LYNCHBURG, VIRGINIA and  
OFFICER SETH REED

By /s/ John R. Fitzgerald  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of November, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to:

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